

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

JAMES L. WILLIAMS, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action 8:16-cv-00058-PX
)	
CORELOGIC RENTAL PROPERTY)	
SOLUTIONS, LLC)	
)	
Defendant.)	

**CONSENT MOTION TO MODIFY
SCHEDULING ORDER AND DISCOVERY ORDER**

Plaintiffs James L. Williams and Hector Hernandez (“Plaintiffs”), through their counsel, respectfully request that this Court modify the January 19, 2017 Amended Scheduling Order (ECF No. 91).

Since the schedule was last amended, Defendant has made the production of its database information, as set forth in the Consent Order (ECF No. 78). Plaintiffs also are in receipt of additional technical documents, which were produced arising out of cooperative meet and confer discussions between the parties. Plaintiffs have also further received the documents that were discussed during the January 25, 2017 conference call with the Court. The parties also are in the process of determining a mutually-acceptable methodology by which Plaintiffs can request file disclosures, as set forth in ECF No. 78.

Accordingly, Plaintiffs request that the schedule be further modified so that there is additional time to engage in expert analysis of the database information. Plaintiffs request that the scheduling order be extended for 60 days as set forth below. Plaintiffs do not request an

extension of **non-expert** discovery as noted below. Defendant has consented to this proposed schedule.

Plaintiffs request that the Court modify the schedule as follows:

	Prior Deadline	Requested Deadline
Plaintiffs' and Defendant's Rule 26(a)(2) expert disclosures	March 7, 2017	May 9, 2017
Plaintiffs' and Defendant's Rule 26(a)(2) expert rebuttal disclosures	April 20, 2017	June 20, 2017
Rule 26(e)(2) supplementation of disclosures and responses	April 27, 2017	June 28, 2017
Discovery deadline; submission of status report	May 3, 2017	No date change, limit to non-expert discovery deadline
Expert discovery deadline;	May 3, 2017	July 27, 2017
Requests for Admission	May 18, 2017	July 18, 2017
Dispositive pretrial motions deadline	June 7, 2017	August 8, 2017
Motion for class certification deadline	June 7, 2017	August 8, 2017

Upon submission of the request for a pre-motion conference with respect to a motion for class certification and/or motion for summary judgment, the parties request that the Court hold a status conference to establish a briefing schedule for the resolution of the motion(s).

Unless modified herein, the provisions contained in the initial April 6, 2016 Order, August 4, 2016 Order, and November 10, 2016 shall remain in effect.

WHEREFORE, for the above-stated reasons, counsel for all parties respectfully request that the current Scheduling Order issued by the Court be modified as set forth above.

WE ASK FOR THIS:

**JAMES L. WILLIAMS and
HECTOR HENANDEZ**

/s/ Kristi Cahoon Kelly

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SEEN AND AGREED:

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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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